

BURNS BAIR LLP

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**Objection Deadline: May 17, 2023**

*Special Insurance Counsel to the Official Committee  
of Unsecured Creditors of The Roman Catholic Diocese  
of Rockville Centre, New York*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

THE ROMAN CATHOLIC DIOCESE OF  
ROCKVILLE CENTRE, NEW YORK,  
Debtor.

Chapter 11

Case No. 20-12345 (MG)

**TWENTY-NINTH MONTHLY FEE STATEMENT OF BURNS BAIR LLP,  
AS SPECIAL INSURANCE COUNSEL TO THE OFFICIAL COMMITTEE OF  
UNSECURED CREDITORS FOR PROFESSIONAL SERVICES RENDERED  
AND DISBURSEMENTS INCURRED FOR THE PERIOD FROM  
MARCH 1, 2023 THROUGH MARCH 31, 2023**

Name of Applicant:	<u>Burns Bair LLP</u>
Authorized to Provide Professional Services to:	<u>Official Committee of Unsecured Creditors</u>
Date of Retention:	Effective October 29, 2020 pursuant to Order dated December 9, 2020 [Docket No. 246]
Period for which compensation and reimbursement is sought:	<u>March 1, 2023 – March 31, 2023</u>
Amount of Compensation sought as actual, reasonable, and necessary:	\$69,618.00 <u>80% of which is \$55,694.40</u>
Amount of Expense Reimbursement sought as actual, reasonable, and necessary:	<u>\$0</u>
TOTAL (80% of fees and 100% of costs)	<u>\$55,694.40</u>

**This is the twenty-ninth monthly fee statement.**

## **PRELIMINARY STATEMENT**

Burns Bair LLP (“Burns Bair”), as Special Insurance Counsel to the Official Committee of Unsecured Creditors (the “Committee”) of The Roman Catholic Diocese of Rockville Centre, New York (the “Debtor”), hereby submits this twenty-ninth monthly statement (the “Monthly Statement”) for the period from March 1, 2023 through March 31, 2023 (the “Statement Period”) for payment of professional services rendered and reimbursement of expenses incurred during the Statement Period pursuant to the Court’s *Order Authorizing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* dated November 4, 2020 [Docket No. 129] (the “Interim Compensation Order”). Burns Bair requests interim allowance and payment of compensation in the amount of \$55,694.40 (80% of \$69,618) for fees on account of reasonable and necessary professional services rendered to the Committee by Burns Bair.

### **FEES FOR SERVICES RENDERED DURING THE STATEMENT PERIOD**

1. Set forth below is a list of the positions of the Burns Bair professionals and paraprofessionals who provided services to the Committee during the Statement Period, their respective billing rates, and the aggregate hours spent by each professional and paraprofessional in providing services on behalf of the Committee during the Statement Period.

<b>Name</b>	<b>Title</b>	<b>Year of Partnership</b>	<b>Year of Admission</b>	<b>Hourly Rate</b>	<b>Total Hours Billed</b>	<b>Total Compensation</b>
Timothy Burns	Partner	2008	1991	\$975	24.19	\$23,497.50
Jesse Bair	Partner	2020	2013	\$625	58.50	\$36,562.50
Nathan Kuenzi	Associate	N/A	2020	\$420	.20	\$84.00
Brian Cawley	Associate	N/A	2020	\$420	18.10	\$7,602.00
Leakhena Au	Associate	N/A	2020	\$420	3.60	\$1,512.00
Alyssa Turgeon	Paralegal	N/A	N/A	\$360.00	.20	\$72.00
Brenda Horn-Edwards	Paralegal	N/A	N/A	\$360.00	.80	\$288.00
<b>TOTAL:</b>					<b>105.50</b>	<b>\$69,618.00</b>

2. The rates charged by Burns Bair for services rendered to the Committee are the same rates that it charges generally for professional services rendered to its non-bankruptcy clients.

A complete itemization of tasks performed by these professionals and paraprofessionals for the Statement Period is annexed hereto as **Exhibit A**.

### **NOTICE AND OBJECTION PROCEDURES**

3. No trustee or examiner has been appointed in these chapter 11 cases. Pursuant to the Interim Compensation Order, Burns Bair has provided notice of this statement upon the following parties by electronic or first class mail: (a) the Debtor c/o The Roman Catholic Diocese of Rockville Centre, 50 N Park Ave P.O. Box 9023, Rockville Centre, NY 11571-9023 (Attn: Thomas Renker); (b) the attorneys for the Debtor, Jones Day, 250 Vesey Street, New York, NY 10281 (Attn: Corinne Ball, Esq., Benjamin Rosenblum, Esq. and Andrew M. Butler, Esq.); and (c) the Office of the United States Trustee Region 2 (the “U.S. Trustee”), 201 Varick Street, Suite 1006, New York, NY 10014 (Attn: Greg Zipes, Esq. and Shara Cornell, Esq.). Burns Bair submits that no other or further notice need be provided.

4. Pursuant to the Interim Compensation Order, objections to this Monthly Statement, if any, must be served upon the Application Recipients by **May 17, 2023** (the “**Objection Deadline**”) setting forth the nature of the objection and the amount of fees or expenses at issue.

5. If no objections to this Monthly Statement are made on or before the Objection Deadline, the Debtor shall pay Burns Bair 80% of the fees and 100% of the expenses set forth above. To the extent an objection to this Monthly Statement is timely made, the Debtor shall withhold payment of that portion of the Monthly Statement to which the objection is directed and promptly pay the remainder of the fees and disbursements in the percentages set forth above. To the extent such objection is not resolved; it shall be preserved and presented to the Court at the next interim or final fee application hearing.

Dated: May 2, 2023

BURNS BAIR LLP

/s/ Timothy W. Burns

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*Special Insurance Counsel to the Official  
Committee of Unsecured Creditors of The Roman  
Catholic Diocese of Rockville Centre, New York*

## **EXHIBIT A**

# Burns | Bair

10 E. Doty St., Suite 600  
Madison, Wisconsin 53703-3392  
608-286-2302  
www.BurnsBair.com

**The Official Committee of Unsecured Creditors of The  
Roman Catholic Diocese of Rockville Centre**

**Issue Date :** 4/4/2023

**Bill # :** 01099

**Matter:** Insurance

## PROFESSIONAL SERVICES RENDERED

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
3/1/2023	Jesse Bair	Review G. Greenwood correspondence with Diocese re proposed insurance preliminary injunction exhibits (.1);	0.10	\$62.50
3/1/2023	Jesse Bair	Review recent New York state court decision re notice under the CVA (.2); review correspondence with PSZJ re same (.1);	0.30	\$187.50
3/1/2023	Jesse Bair	Review correspondence with PSZJ and state court counsel re judicial mediator selection (.1);	0.10	\$62.50
3/1/2023	Jesse Bair	Listen to and respond to voice-message from Reed Smith re LMI district court action (.1);	0.10	\$62.50
3/1/2023	Jesse Bair	Review the Diocese's eighth omnibus claims objection (.4);	0.40	\$250.00
3/1/2023	Timothy Burns	Review correspondence with PSZJ and state court counsel re potential mediation session (.2); review the Diocese's eighth omnibus claims objection (.4); review various correspondence between PSZJ and state court counsel re judicial mediator selection (.3); review and consider PSZJ memo re next steps re plan and disclosure statement (.2);	1.10	\$1,072.50
3/2/2023	Jesse Bair	Review current version of Committee work-in-progress litigation list (.1);	0.10	\$62.50
3/2/2023	Jesse Bair	Participate in conference with PSZJ team re mediation and litigation strategy (1.3);	1.30	\$812.50
3/2/2023	Jesse Bair	Analysis re third-party release issue re Diocese Plan (.3);	0.30	\$187.50
3/2/2023	Jesse Bair	Begin reviewing draft of second amended Committee Plan (.2);	0.20	\$125.00
3/2/2023	Jesse Bair	Review Herman law firm response to the Diocese's fourth omnibus claims objection (.2);	0.20	\$125.00
3/2/2023	Jesse Bair	Review correspondence with B. Michael and state court counsel re updates re judicial mediator selection (.1);	0.10	\$62.50

3/2/2023	Jesse Bair	Review draft letter to the Diocese re judicial mediator selection (.1);	0.10	\$62.50
3/2/2023	Jesse Bair	Review suggested edits from state court counsel to current draft of the Committee's objection to the Diocese's preliminary injunction motion (.1);	0.10	\$62.50
3/2/2023	Jesse Bair	Review Marsh law firm response to the Diocese's fourth omnibus claims objection (.2);	0.20	\$125.00
3/2/2023	Jesse Bair	Review correspondence from the Diocese re proposed preliminary injunction insurance exhibits (.1);	0.10	\$62.50
3/3/2023	Jesse Bair	Participate in state court counsel meeting re mediation strategy (.9);	0.90	\$562.50
3/3/2023	Jesse Bair	Review draft Committee joint letter to the Court re estimation and judicial mediator selection (.1);	0.10	\$62.50
3/3/2023	Jesse Bair	Review B. Cawley's email memorandum re potential insurance impacts, if any, of certain claim objections (.1);	0.10	\$62.50
3/3/2023	Jesse Bair	Review deposition outline for E. Stephens (.5); review correspondence with J. Stang and state court counsel re same (.1);	0.60	\$375.00
3/3/2023	Jesse Bair	Review LMI and Interstate's letter to the Court re estimation and judicial mediator issue (.1);	0.10	\$62.50
3/3/2023	Timothy Burns	Participate in state court counsel meeting re mediator selection, preliminary injunction, and ongoing case issues (.9); participate in call with J. Bair and I. Nasatir re preparations and strategy for upcoming Porter deposition(.1);	1.00	\$975.00
3/3/2023	Jesse Bair	Review the Diocese's letter to the Committee re judicial mediator issues (.1);	0.10	\$62.50
3/3/2023	Jesse Bair	Participate in conference with I. Nasatir and T. Burns re preparations and strategy for upcoming Porter deposition (.1);	0.10	\$62.50
3/3/2023	Jesse Bair	Review the Debtor's reply in support of its 4th omnibus claims objection (.3);	0.30	\$187.50
3/4/2023	Jesse Bair	Correspondence with G. Greenwood re potential additional insurance-related preliminary injunction exhibits and the Diocese's proposed edits to the existing insurance schedules (.2);	0.20	\$125.00
3/4/2023	Jesse Bair	Analysis regarding the Diocese's suggested edits to the Committee's proposed preliminary injunction insurance exhibits (.3);	0.30	\$187.50
3/4/2023	Jesse Bair	Analysis regarding potential insurance edit to the Committee's preliminary injunction opposition brief (.1);	0.10	\$62.50
3/4/2023	Jesse Bair	Analysis re potential additional insurance-related preliminary injunction exhibits proposed by the Diocese (.3);	0.30	\$187.50
3/4/2023	Jesse Bair	Review and edit BB's seventh interim fee application (.9);	0.90	\$562.50

3/4/2023	Timothy Burns	Review correspondence with the Diocese and PSZJ re preliminary injunction hearing exhibits (.1); review the parties' letters to the court re judicial mediator issue (.1);	0.20	\$195.00
3/4/2023	Jesse Bair	Analysis regarding Porter deposition strategy (.1);	0.10	\$62.50
3/4/2023	Jesse Bair	Review correspondence with the Diocese and G. Greenwood re proposed insurance preliminary injunction exhibits and suggested edits to same (.2);	0.20	\$125.00
3/5/2023	Jesse Bair	Correspondence with B. Horn re edits needed to BB's seventh interim fee application (.1);	0.10	\$62.50
3/5/2023	Jesse Bair	Review initial Claro insurance questions in preparation for upcoming call (.2); correspondence with A. Kornfeld re same (.1);	0.30	\$187.50
3/5/2023	Timothy Burns	Review correspondence with the Diocese and PSZJ re preliminary injunction hearing exhibits (.2); review J. Cronan's order re discovery dispute (.1);	0.30	\$292.50
3/6/2023	Jesse Bair	Review and respond to additional insurance question received from Claro (.2);	0.20	\$125.00
3/6/2023	Jesse Bair	Review initial draft of proposed K. Porter deposition outline (.8);	0.80	\$500.00
3/6/2023	Jesse Bair	Analyze the Arrowood policies re retroactive premium adjustment (.3); analyze case law re enforceability, if any, of retroactive premium adjustment in bankruptcy (.4);	0.70	\$437.50
3/6/2023	Jesse Bair	Begin drafting revised version of the Porter deposition outline, including review of prior Porter declarations (.5);	0.50	\$312.50
3/6/2023	Jesse Bair	Participate in portion of Committee meeting re ongoing case issues (.6);	0.60	\$375.00
3/6/2023	Jesse Bair	Review the Diocese's letter to the Court re the Committee's claim objection adjournment request (.1);	0.10	\$62.50
3/6/2023	Jesse Bair	Prepare for call with Claro re insurance allocation analysis (.1); participate in call with Claro and PSZJ re insurance allocation analysis and outstanding questions re same (1.0);	1.10	\$687.50
3/6/2023	Jesse Bair	Participate in call with Reed Smith re case insurance issues (.2);	0.20	\$125.00
3/6/2023	Timothy Burns	Review and revise initial draft of Porter deposition outline (.7); correspondence with J. Bair re same (.1); begin review of Moore deposition transcript (.9);	1.70	\$1,657.50
3/6/2023	Jesse Bair	Analyze and respond to Claro questions re applicable policy limits (.3);	0.30	\$187.50
3/7/2023	Jesse Bair	Participate in call with G. Greenwood re the preliminary injunction insurance schedules and potential exhibits for the Porter deposition (.3);	0.30	\$187.50
3/7/2023	Jesse Bair	Prepare for Porter deposition, including drafting revised Porter depo outline and analyzing related case materials, including Diocesan PI discovery responses, earlier Porter declarations, and associated case briefing (3.2);	3.20	\$2,000.00



3/7/2023	Jesse Bair	Review revised preliminary injunction insurance schedules received from the Diocese (.2); participate in call with the Diocese, G. Greenwood, and I. Nasatir re same and potential additional revisions (.3); participate in follow-up call with I. Nasatir re same (.1);	0.60	\$375.00
3/7/2023	Jesse Bair	Review and respond to correspondence with PSZJ team re strategy and preparations for upcoming Porter depositions (.2);	0.20	\$125.00
3/8/2023	Jesse Bair	Review K. Dine email memorandum re mediation session outcome and related follow-up items (.1);	0.10	\$62.50
3/8/2023	Timothy Burns	Participate in conference with J. Bair re mediation session outcome and potential next-steps (.2); supplemental analysis re going-forward insurance strategy (.1);	0.30	\$292.50
3/8/2023	Jesse Bair	Review correspondence from K. Dine re upcoming status conference with the Court re mediation and claim objection process (.1);	0.10	\$62.50
3/8/2023	Jesse Bair	Review correspondence from E. Stephens re further revised preliminary injunction insurance schedules from the Diocese (.1); review proposed insurance schedules (.1); draft correspondence to PSZJ and T. Burns re additional edits needed to same (.1);	0.30	\$187.50
3/8/2023	Jesse Bair	Draft correspondence to the Diocese re potential additional edits to the revised preliminary injunction insurance schedules (.2); additional correspondence with G. Greenwood re finalizing insurance schedules (.1);	0.30	\$187.50
3/8/2023	Jesse Bair	Continue preparing for Porter deposition, including drafting revised Porter depo outline, analyzing related case materials, and identifying potential exhibits for deposition (5.0);	5.00	\$3,125.00
3/8/2023	Jesse Bair	Participate in call with I. Nasatir re mediation session outcome and upcoming Porter deposition (.3);	0.30	\$187.50
3/8/2023	Jesse Bair	Review and respond to correspondence with G. Greenwood re Porter deposition exhibits (.3);	0.30	\$187.50
3/8/2023	Jesse Bair	Participate in conference with T. Burns re mediation session outcome and potential next-steps (.2);	0.20	\$125.00
3/8/2023	Jesse Bair	Review correspondence from B. Michael re potential motion to dismiss and associated research results (.1);	0.10	\$62.50
3/9/2023	Jesse Bair	Review correspondence from B. Michael re upcoming claim objection hearing (.1);	0.10	\$62.50
3/9/2023	Jesse Bair	Participate in conference with T. Burns re outcome of court status conference and Porter deposition (.2);	0.20	\$125.00
3/9/2023	Jesse Bair	Participate in conference with T. Burns re status of the insurance adversary proceedings and judicial mediator issue (.2);	0.20	\$125.00
3/9/2023	Jesse Bair	Participate in conference with T. Burns re recent call with Reed Smith re case insurance issues (.1);	0.10	\$62.50
3/9/2023	Jesse Bair	Review the Diocese's supplemental preliminary injunction discovery responses and document production (.4);	0.40	\$250.00

3/9/2023	Jesse Bair	Continue preparing for Porter deposition (.4);	0.40	\$250.00
3/9/2023	Jesse Bair	Review correspondence with G. Greenwood and the Diocese re finalizing the preliminary injunction insurance schedules (.1);	0.10	\$62.50
3/9/2023	Jesse Bair	Participate in conference with PSZJ team and T. Burns re mediation strategy, potential motion to dismiss, and other ongoing case issues (1.6);	1.60	\$1,000.00
3/9/2023	Jesse Bair	Participate in call with I. Nasatir re outcome of Porter deposition (.2);	0.20	\$125.00
3/9/2023	Jesse Bair	Conduct deposition of K. Porter (2.8);	2.80	\$1,750.00
3/9/2023	Timothy Burns	Correspondence with B. Michael and J. Bair re court conference re judicial mediator (.2); review correspondence with the Diocese and PSZJ re supplemental discovery materials from Diocese (.2); review and analysis of email from K. Dine re mediation summary (.2); review correspondence from B. Michael re Diocese's SOL argument (.1); review Diocese monthly PSIP information report (.1); conference with J. Bair re preparations for judicial mediator conference with J. Glenn (.2); conference with J. Bair re recent call with Reed Smith (.1); prepare for conference with court re judicial mediator, including review of emails re same (.2); meet with team re hearing logistics (.1); review of Diocese's supplemental discovery responses, including review of attached exhibits (Ecclesia policy and Arrowood financial reporting information) (.8); attend virtual chambers conference for insurance purposes (.6); emails and call from state court counsel re case and resolution strategy (.3); review correspondence from PSZJ re upcoming claims objections hearing (.1); conference with J. Bair re Porter deposition and Chambers conference outcome (.2); participate in portion of meeting with PSZJ and J. Bair re next steps re bankruptcy for insurance purposes (1.5);	4.90	\$4,777.50
3/10/2023	Jesse Bair	Correspondence with B. Michael re BB's seventh interim fee application (.1);	0.10	\$62.50
3/10/2023	Jesse Bair	Review monthly PSIP information provided by the Diocese (.1);	0.10	\$62.50
3/10/2023	Jesse Bair	Review correspondence with the Diocese re finalizing the preliminary injunction insurance exhibits (.1); review proposed final versions of the exhibits (.1);	0.20	\$125.00
3/10/2023	Jesse Bair	Review correspondence from Arrowood re Arrowood's request to attend preliminary injunction depositions (.1);	0.10	\$62.50
3/10/2023	Jesse Bair	Review draft stipulation and order re the admissibility of preliminary injunction exhibits (.1);	0.10	\$62.50
3/11/2023	Jesse Bair	Review correspondence with K. Brown re potential edits to the preliminary injunction opposition brief (.1);	0.10	\$62.50
3/11/2023	Timothy Burns	Review Agenda for March 14 Hearing (.1); review stipulation and order regarding admissibility of preliminary injunction exhibits (.1); review Arrowood correspondence re deposition attendance request (.1);	0.30	\$292.50

3/13/2023	Jesse Bair	Review the Debtor's reply in support of its fifth omnibus claims objection (.3);	0.30	\$187.50
3/13/2023	Jesse Bair	Review debtor reply brief in support of cell tower sale (.1);	0.10	\$62.50
3/13/2023	Jesse Bair	Correspondence with I. Nasatir and K. Brown re error in the Porter dispositions transcript (.1); correspondence with the Debtor re correcting same (.1);	0.20	\$125.00
3/13/2023	Nathan Kuenzi	Participate in BB team meeting re case status and ongoing projects (.1);	0.10	\$42.00
3/13/2023	Jesse Bair	Review correspondence from B. Michael re upcoming Committee meeting (.1);	0.10	\$62.50
3/13/2023	Leakhena Au	Participate in BB team meeting re case status and ongoing projects (.1);	0.10	\$42.00
3/13/2023	Alyssa Turgeon	Participate in BB team meeting re case status and ongoing projects (.1);	0.10	\$36.00
3/13/2023	Timothy Burns	Participate in state court counsel meeting for insurance purposes re ongoing case issues (.8); participate in BB team meeting re case status and ongoing projects (.1);	0.90	\$877.50
3/13/2023	Jesse Bair	Participate in BB team meeting re case status and ongoing projects (.1);	0.10	\$62.50
3/13/2023	Jesse Bair	Review additional correspondence with G. Greenwood, K. Dine, and B, Michael re finalization of preliminary injunction opposition brief (.1);	0.10	\$62.50
3/13/2023	Jesse Bair	Review suggested insurance edit to the Committee's preliminary injunction opposition brief received from I. Nasatir (.1); review and respond to correspondence with G. Greenwood and I. Nasatir re same and final additional insurance edits to the Committee's preliminary injunction opposition brief (.3);	0.40	\$250.00
3/13/2023	Jesse Bair	Review and edit most recent draft of the Committee's preliminary injunction opposition brief, including incorporating excerpts from the recent Porter deposition (1.2);	1.20	\$750.00
3/13/2023	Jesse Bair	Participate in state court counsel meeting for insurance purposes re ongoing case issues (.8);	0.80	\$500.00
3/14/2023	Jesse Bair	Correspondence with G. Greenwood re supplemental insurance edit to the Committee preliminary injunction opposition brief (.1);	0.10	\$62.50
3/14/2023	Timothy Burns	Review agenda for March 14 hearing (.1); attend court hearing on claim objections, cell tower sale, and status conference to assess insurance-related settlement issues (2.7);	2.80	\$2,730.00
3/14/2023	Jesse Bair	Review correspondence with J. Stang, K. Dine, and state court counsel re status conference outcome and potential next-steps (.2);	0.20	\$125.00
3/14/2023	Jesse Bair	Review and edit Porter deposition exhibit to the Committee preliminary injunction opposition brief (.3);	0.30	\$187.50

3/14/2023	Jesse Bair	Attend court hearing on claim objections, cell tower sale, and status conference to assess insurance-related settlement issues (2.7);	2.70	\$1,687.50
3/14/2023	Jesse Bair	Review additional correspondence with G. Greenwood and I. Nasatir re final insurance edits to the Committee's preliminary injunction opposition brief (.1);	0.10	\$62.50
3/15/2023	Timothy Burns	Review correspondence with state court counsel, PSZJ, and the Committee re status conference outcome and potential next-steps (.2);	0.20	\$195.00
3/16/2023	Jesse Bair	Review revised version of preliminary injunction evidentiary stipulation received from the Diocese (.1); correspondence with K. Brown, G. Greenwood, and I. Nasatir re same (.1); review additional correspondence with the Diocese re same (.1);	0.30	\$187.50
3/16/2023	Jesse Bair	Participate in call with J. Stang re status of the insurance district court actions and overall insurance strategy (.3);	0.30	\$187.50
3/16/2023	Jesse Bair	Review and respond to correspondence with J. Stang re Evanston district court status update letter (.2);	0.20	\$125.00
3/16/2023	Jesse Bair	Draft proposed language for Evanston district court status update letter re the current status of the case and mediation negotiations (.3);	0.30	\$187.50
3/16/2023	Jesse Bair	Review insurer exposure analysis (.1); assess potential next-steps in connection with insurance negotiations (.1);	0.20	\$125.00
3/16/2023	Jesse Bair	Review draft status update letter circulated by the Diocese (.1); correspond with the Diocese re suggested edits to same (.1); review revised version of the status update letter for the Evanston district court action (.1); review correspondence with Evanston re same (.1);	0.40	\$250.00
3/16/2023	Jesse Bair	Review and respond to correspondence with the Diocese re joint status letter due in the Evanston district court action (.2);	0.20	\$125.00
3/17/2023	Jesse Bair	Review correspondence with PSZJ and state court counsel re final version of preliminary injunction opposition brief and next-steps (.1);	0.10	\$62.50
3/17/2023	Jesse Bair	Review Evanston's suggested edits to the draft joint status update letter (.1);	0.10	\$62.50
3/17/2023	Jesse Bair	Review correspondence from B. Michael to state court counsel re case update (.1);	0.10	\$62.50
3/17/2023	Timothy Burns	Review joint status update letter to court in Evanston adversary proceeding (.1);	0.10	\$97.50
3/17/2023	Jesse Bair	Review draft joinder in support of the Committee's preliminary injunction opposition brief (.1);	0.10	\$62.50
3/18/2023	Jesse Bair	Review correspondence with K. Dine and the Committee re preliminary injunction briefing issues (.1);	0.10	\$62.50
3/21/2023	Jesse Bair	Correspondence with E. Stephens re edit to the Porter deposition transcript (.1);	0.10	\$62.50

3/21/2023	Brenda Horn	Draft BB's twenty-eighth monthly fee statement (.6); generate and edit Exhibit A to same (.1); correspond with J. Bair re same (.1);	0.80	\$288.00
3/21/2023	Jesse Bair	Provide instructions to B. Cawley re supplemental research needed re the insurers' purported late notice defense (.1); review B. Cawley email memorandum summarizing supplemental research results (.1);	0.20	\$125.00
3/21/2023	Jesse Bair	Review correspondence with B. Michael re Committee motion to dismiss (.1);	0.10	\$62.50
3/21/2023	Timothy Burns	Participate in conference with J. Bair re case insurance strategy (.3);	0.30	\$292.50
3/21/2023	Brian Cawley	Analysis re the ability of an injured party to provide notice instead of a policyholder under New York Insurance Law Section 3420 (1.8); draft summary of Section 3420 research (.2);	2.00	\$840.00
3/21/2023	Jesse Bair	Participate in conference with T. Burns re case insurance strategy (.3);	0.30	\$187.50
3/22/2023	Jesse Bair	Review the Parishes' response to the Committee's claim objections (.3); review related appendix re PSIP issues (.1);	0.40	\$250.00
3/22/2023	Timothy Burns	Analysis and consideration of claimant notice issue under New York Insurance Law Section 3420 (.3); conference with J. Bair re same (.1); correspond with J. Bair re same (.1);	0.50	\$487.50
3/22/2023	Jesse Bair	Review and respond to questions from state court counsel re additional insured issues (.2);	0.20	\$125.00
3/22/2023	Jesse Bair	Respond to T. Burns correspondence re the insurers' purported late notice defense and supplemental research needed in connection with same (.1); participate in conference with T. Burns re same (.1);	0.20	\$125.00
3/22/2023	Jesse Bair	Review the Diocese's reply in support of its sixth omnibus claims objection (.4);	0.40	\$250.00
3/23/2023	Jesse Bair	Analyze LMI's answer and affirmative defenses in the LMI district court action (.4);	0.40	\$250.00
3/23/2023	Leakhena Au	Participate in BB team meeting re case status and ongoing projects (.1);	0.10	\$42.00
3/23/2023	Jesse Bair	Participate in call with J. Stang re the Committee's motion to dismiss, case status, and related insurance issues (.3);	0.30	\$187.50
3/23/2023	Jesse Bair	Analyze and respond to questions from state court counsel re historical Diocesan insurance issues (.3);	0.30	\$187.50
3/23/2023	Jesse Bair	Review recent appellate decision re Diocesan liability for CVA claims (.1);	0.10	\$62.50
3/23/2023	Jesse Bair	Participate in BB team meeting re case developments and associated projects (.1);	0.10	\$62.50
3/23/2023	Brian Cawley	Additional research re claimant notice requirements under New York Insurance Law Section 3420 (.3); draft summary of research findings (.1);	0.40	\$168.00
3/23/2023	Timothy Burns	Participate in BB team meeting re case developments and associated projects (.1);	0.10	\$97.50

3/23/2023	Jesse Bair	Review correspondence with I. Nasatir and BRG re PSIP issues (.1);	0.10	\$62.50
3/23/2023	Brian Cawley	Participate in BB team meeting re case developments and associated projects (.1);	0.10	\$42.00
3/23/2023	Jesse Bair	Provide instructions to L. Au re additional insured analysis needed in connection with the Committee's motion to dismiss (.1);	0.10	\$62.50
3/23/2023	Alyssa Turgeon	Participate in BB team meeting re case developments and associated projects (.1);	0.10	\$36.00
3/23/2023	Jesse Bair	Begin reviewing and editing the Committee's motion to dismiss (.5);	0.50	\$312.50
3/23/2023	Jesse Bair	Review correspondence with K. Dine, I. Nasatir. and K. Brown re potential edits to the draft motion to dismiss (.1);	0.10	\$62.50
3/23/2023	Jesse Bair	Analyze Lexington's answer and affirmative defenses in the LMI district court action (.2);	0.20	\$125.00
3/23/2023	Nathan Kuenzi	Participate in BB team meeting re case developments and associated projects (.1);	0.10	\$42.00
3/24/2023	Jesse Bair	Review correspondence with B. Michael and state court counsel re potential judicial mediator candidate (.1);	0.10	\$62.50
3/24/2023	Timothy Burns	Review the Committee's draft motion to dismiss (.9); participate in state court counsel meeting re ongoing case issues and strategy (.7); review email from B. Michael re potential judicial mediator (.1); review agenda for March 28 court hearing (.1); review recent 1st Dept appellate decision re Diocesan liability for CVA claims (.1); review Marsh plaintiffs Joinder to Objection to Injunction Motion (.1); review and consider B. Cawley research results re notice issues under New York Insurance Law Section 3420 (.2); review correspondence with PSZJ and state court counsel re motion to dismiss (.1); review correspondence with PSZJ and BRG re PSIP issues (.1); review K. Dine's suggested edits to the draft motion to dismiss (.1);	2.50	\$2,437.50
3/24/2023	Leakhena Au	Conduct supplemental additional insured analysis needed in connection with motion to dismiss briefing (3.4);	3.40	\$1,428.00
3/24/2023	Jesse Bair	Review survivor response to the Diocese's 9th omnibus claims objection (.2);	0.20	\$125.00
3/24/2023	Jesse Bair	Analyze L. Au research results re supplemental additional insured analysis completed in connection with motion to dismiss briefing (.2); review Diocese Plan terms and exhibits in relation to same (.2);	0.40	\$250.00
3/24/2023	Jesse Bair	Edit and revise the Committee's motion to dismiss brief with focus on insurance-related edits (1.2);	1.20	\$750.00
3/24/2023	Jesse Bair	Participate in state court counsel meeting re ongoing case issues and strategy (.7);	0.70	\$437.50
3/24/2023	Jesse Bair	Review second survivor response to the Diocese's 9th omnibus claims objection (.2);	0.20	\$125.00

3/24/2023	Jesse Bair	Correspondence with G. Greenwood re preliminary injunction hearing preparations (.1);	0.10	\$62.50
3/24/2023	Jesse Bair	Review and respond to correspondence with L. Au re supplemental additional insured analysis needed in connection with motion to dismiss briefing (.2);	0.20	\$125.00
3/25/2023	Jesse Bair	Review letter from the Committee to the Diocese re recent appellate decision impacting the Diocese's claims objections (.1);	0.10	\$62.50
3/25/2023	Jesse Bair	Review correspondence from K. Brown and G. Greenwood re preliminary injunction hearing evidence (.1);	0.10	\$62.50
3/26/2023	Jesse Bair	Analysis re insurance-related evidence for use during the preliminary injunction hearing (.1); correspondence with K, Brown and G. Greenwood re same (.1);	0.20	\$125.00
3/26/2023	Jesse Bair	Review correspondence from state court counsel re recent appellate decision impacting the Diocese's claim objections (.1);	0.10	\$62.50
3/26/2023	Timothy Burns	Participate in calls with state court counsel re insurance issues and strategy (.5);	0.50	\$487.50
3/27/2023	Jesse Bair	Review final version of the Committee's motion to dismiss (.1);	0.10	\$62.50
3/27/2023	Jesse Bair	Review correspondence from the Diocese re its refusal to withdraw its 6th omnibus claims objection in light of recent appellate decision (.1);	0.10	\$62.50
3/27/2023	Jesse Bair	Review the Committee's motion to stay (.2);	0.20	\$125.00
3/27/2023	Jesse Bair	Review correspondence with G. Greenwood and the Diocese re preliminary injunction exhibits and evidence (.1);	0.10	\$62.50
3/27/2023	Jesse Bair	Participate in conference with T. Burns re potential claims against the Diocese's insurers and related Arrowood issues (.2);	0.20	\$125.00
3/27/2023	Jesse Bair	Review the parties' joint correspondence to the Court re potential judicial mediator (.1);	0.10	\$62.50
3/27/2023	Timothy Burns	Participate in conference with J. Bair re potential claims against the Diocese's insurers and related Arrowood issues (.2); participate in call with state court counsel re same (.3);	0.50	\$487.50
3/27/2023	Jesse Bair	Review correspondence with J. Stang, B. Michael, and state court counsel re next-steps re the Committee's motion to dismiss (.1);	0.10	\$62.50
3/28/2023	Jesse Bair	Review agenda for Committee meeting (.1); participate in Committee meeting re ongoing case issues for insurance purposes (1.4);	1.50	\$937.50
3/28/2023	Jesse Bair	Review Porter errata sheet (.1);	0.10	\$62.50
3/28/2023	Jesse Bair	Participate in meeting with PSZJ and state court counsel re motion to dismiss and going-forward case strategy (1.0); participate in post-call meeting with PSZJ team and T. Burns re same (.7);	1.70	\$1,062.50
3/28/2023	Timothy Burns	Conference with J. Bair re ongoing developments and strategy on insurance (.2);	0.20	\$195.00

3/28/2023	Jesse Bair	Attend hearing on claims objections for insurance purposes (1.6);	1.60	\$1,000.00
3/28/2023	Jesse Bair	Review correspondence with J. Stang and state court counsel re motion to dismiss issues (.1);	0.10	\$62.50
3/28/2023	Brian Cawley	Begin analyzing recent BSA district court opinion re issues implicating DRVC action (1.5);	1.50	\$630.00
3/28/2023	Jesse Bair	Conference with T. Burns re ongoing developments and strategy on insurance (.2);	0.20	\$125.00
3/28/2023	Jesse Bair	Provide instructions to B. Cawley re analysis needed in connection with recent BSA decision re ongoing issues in DRVC case (.1);	0.10	\$62.50
3/28/2023	Timothy Burns	Attend hearing on claims objections for insurance purposes (1.6); participate in meeting with PSZJ and state court counsel re motion to dismiss and going-forward case strategy (1.0); participate in post-call meeting with PSZJ team and J. Bair re same (.7); review correspondence from state court counsel re joinders in motion to dismiss (.1); participate in Committee meeting re ongoing case issues for insurance purposes (1.4);	4.80	\$4,680.00
3/28/2023	Jesse Bair	Analysis re potential motion to dismiss insurance-related discovery (.1);	0.10	\$62.50
3/29/2023	Jesse Bair	Review draft preliminary injunction exhibit list and and consider potential additions to same (.2); correspondence with G. Greenwood and K. Brown re same (.1);	0.30	\$187.50
3/29/2023	Jesse Bair	Review the Diocese's reply in support of its eighth omnibus claims objection (.4);	0.40	\$250.00
3/29/2023	Jesse Bair	Review notice of hearing re seventh interim fee applications (.1);	0.10	\$62.50
3/29/2023	Brian Cawley	Continue analyzing detailed BSA district court opinion re issues implicating DRVC action (4.6);	4.60	\$1,932.00
3/29/2023	Jesse Bair	Review the Committee's reply in support of its parish and affiliate claim objections (.1);	0.10	\$62.50
3/29/2023	Jesse Bair	Additional analysis re insurance-related motion to dismiss issues (.1);	0.10	\$62.50
3/29/2023	Jesse Bair	Review correspondence with J. Stang, state court counsel, and the Committee re motion to stay issues (.2);	0.20	\$125.00
3/29/2023	Jesse Bair	Review materials re recent Diocesan insurance activities (.1);	0.10	\$62.50
3/30/2023	Jesse Bair	Participate in conference with PSZJ team and T. Burns re ongoing case issues and next-steps (.6);	0.60	\$375.00
3/30/2023	Jesse Bair	Participate in call with T. Burns re insurance issues in connection with potential upcoming mediation (.2);	0.20	\$125.00
3/30/2023	Brian Cawley	Continue analyzing detailed BSA district court opinion re issues implicating DRVC action (2.8);	2.80	\$1,176.00



3/30/2023	Jesse Bair	Review Judge Glenn's pre-trial conference order template (.1); review correspondence with G. Greenwood and K. Brown re preparing same (.1); review correspondence with G. Greenwood and the Diocese re same (.1);	0.30	\$187.50
3/30/2023	Jesse Bair	Review the Court's Order sustaining the Diocese's 4th omnibus claims objection (.5);	0.50	\$312.50
3/30/2023	Jesse Bair	Review analysis of insurance exposures in connection with potential upcoming mediation session (.1);	0.10	\$62.50
3/30/2023	Jesse Bair	Answer B. Cawley questions re project re analysis of recent BSA decision in connection with insurance issues relevant to the DRVC case (.2);	0.20	\$125.00
3/30/2023	Jesse Bair	Review the parties' joint letter to the Court requesting stay of proceedings (.1);	0.10	\$62.50
3/30/2023	Jesse Bair	Review correspondence with G. Greenwood and the Diocese re preliminary injunction exhibit list issues (.1);	0.10	\$62.50
3/30/2023	Timothy Burns	Review correspondence with PSZJ and state court counsel re court rulings and mediation (.2); participate in call with J. Bair re insurance issues in connection with potential upcoming mediation (.2); participate in portion of meeting with PSZJ and J. Bair re ongoing case issues and next-steps (.3);	0.70	\$682.50
3/30/2023	Jesse Bair	Review various correspondence with J. Stang, state court counsel, and the Committee re denial of the motion to stay, potential judicial mediator, and case next-steps (.2);	0.20	\$125.00
3/30/2023	Brian Cawley	Begin outlining memorandum re recent BSA decision in connection with insurance issues relevant to DRVC case (2.9); participate in conference with J. Bair re questions regarding same (.2);	3.10	\$1,302.00
3/31/2023	Timothy Burns	Review correspondence with PSZJ and state court counsel re upcoming Chambers conference re mediation issues (.2);	0.20	\$195.00
3/31/2023	Jesse Bair	Review the Parishes' response to the Committee's preliminary injunction opposition (.1); analyze insurance issues in connection with same (.1);	0.20	\$125.00
3/31/2023	Jesse Bair	Review the Diocese's reply in support of its 9th omnibus claims objection (.4);	0.40	\$250.00
3/31/2023	Brian Cawley	Continue drafting memorandum summarizing recent BSA decision in connection with insurance issues relevant to DRVC case (3.6);	3.60	\$1,512.00
3/31/2023	Jesse Bair	Review the Diocese's and LMI's joint status update letter to Judge Cronan (.1);	0.10	\$62.50
3/31/2023	Jesse Bair	Review state court counsel joinders in support of the Committee's motion to dismiss (.1);	0.10	\$62.50
3/31/2023	Jesse Bair	Review K. Dine email memorandum re outcome of recent conference with the Court and the Diocese (.1); review correspondence with state court counsel and the Committee re same and next-steps (.1);	0.20	\$125.00
<b>Total Hours and Fees</b>			<b>105.50</b>	<b>\$69,618.00</b>

### Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Alyssa Turgeon	0.20	\$360.00	\$72.00
Brenda Horn	0.80	\$360.00	\$288.00
Brian Cawley	18.10	\$420.00	\$7,602.00
Jesse Bair	58.50	\$625.00	\$36,562.50
Leakhena Au	3.60	\$420.00	\$1,512.00
Nathan Kuenzi	0.20	\$420.00	\$84.00
Timothy Burns	24.10	\$975.00	\$23,497.50

**Total Due This Invoice: \$69,618.00**